

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

<b>RAUL MALDONADO</b>	§	
<b>DE LOS REYES</b>	§	
<b>Plaintiffs</b>	§	
 	§	
<b>VS.</b>	§	<b>CIVIL ACTION NO. 7:17-cv-00219</b>
	§	<b>JURY DEMANDED</b>
 	§	
<b>SUSSEX INSURANCE COMPANY</b>	§	
<b>AND DARIELLE THOMPSON</b>	§	
<b>Defendants</b>	§	

**AGREED STIPULATION OF DISMISSAL FOR PLAINTIFF**

Plaintiff Raul Maldonado De Los Reyes and Defendants Sussex Insurance Company and Darielle Thompson file this stipulation of dismissal under Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

1. Plaintiff is Raul Maldonado De Los Reyes, Defendants are Sussex Insurance Company and Darielle Thompson.
2. On January 12, 2017, Plaintiff sued Defendants in the 389<sup>th</sup> Judicial District, Hidalgo County, Texas, Cause No. C-0190-17-H. On May 26, 2017, Sussex Insurance Company filed its Original Answer. On May 26, 2017, Darielle Thompson filed his Original Answer. On June 6, 2017, Sussex Insurance Company filed its Notice of Removal.
3. On or about August 23, 2017, the parties settled this case. As a result of this settlement, all issues in the above-styled and numbered litigation have been fully and finally settled. Plaintiff now moves to dismiss the suit against Defendants.
4. Defendants agree to the dismissal.
5. This case is not a class action under Federal Rule of Civil Procedure 23, a derivative action under Rule 23.1, or an action related to an unincorporated association under Rule 23.2.
6. A receiver has not been appointed in this case.
7. This case is not governed by any federal statute that requires a court order for dismissal of the case.
8. Plaintiff has not previously dismissed any federal- or state-court suit based on or including the same claims as those presented in this case.
9. This dismissal is with prejudice.

Respectfully submitted

By: /s/ Mikell A. West  
Mikell A. West  
Attorney-in-charge  
State Bar No. 24070832  
Southern Dist. No. 1563058  
P.O. Box 6666  
Corpus Christi, Texas 78466  
Telephone: (361) 654-7008  
Fax: (361) 654-7001  
[mwest@gnqlawyers.com](mailto:mwest@gnqlawyers.com)

**ATTORNEYS FOR DEFENDANTS,  
SUSSEX INSURANCE COMPANY AND  
DARIELLE THOMPSON**

*Of counsel:*

GAULT, NYE & QUINTANA, L.L.P.  
P.O. Box 5959  
Brownsville, Texas 78523  
Telephone (956) 544-7110  
Fax: (956) 544-0607

William Gault  
State Bar No. 07765050  
Southern Dist. No. 14685  
[bgault@gnqlawyers.com](mailto:bgault@gnqlawyers.com)

GAULT, NYE & QUINTANA, L.L.P.  
P.O. Box 6666  
Corpus Christi, Texas 78466  
Telephone: (361) 654-7008  
Fax: (361) 654-7001

Thomas F Nye  
State Bar No. 15154025  
Southern Dist. No. 7952  
[tnye@gnqlawyers.com](mailto:tnye@gnqlawyers.com)

Donald W. Elliott, Jr.  
State Bar No. 24097651  
Southern Dist. No. 2783040  
[delliott@gnqlawyers.com](mailto:delliott@gnqlawyers.com)

John R. Lamont  
State Bar No. 24099876  
Southern Dist. No. 3028487  
[jlamont@gnqlawyers.com](mailto:jlamont@gnqlawyers.com)

By: /s/Larry W. Lawrence, Jr.\*

Larry W. Lawrence, Jr.  
State Bar No. 00794145  
Michael Lawrence  
State Bar No. 24055826  
3112 Windsor Rd., Suite A234  
Austin, Texas 78703  
Telephone: (956) 994-0057  
Telecopier: (800) 507-4152  
[Lawrencefirm@gmail.com](mailto:Lawrencefirm@gmail.com)  
Ms. Lory Sopchak  
State Bar No. 24076706  
Cartwright Law Firm, LLP  
1300 Post Oak Blvd, Suite 760  
Houston, Texas 77056  
Telephone: (713) 840-0950  
Telecopier: (713) 840-0046  
[Lory@dcartwrightlaw.net](mailto:Lory@dcartwrightlaw.net)  
**COUNSEL FOR PLAINTIFF,  
RAUL MALDONADO DE LOS REYES**

*\*Signed with permission*

#### **CERTIFICATE OF SERVICE**

I certify that on October 9, 2017, a copy of the parties' Agreed Stipulation of Dismissal was *electronically filed* on the CM/ECF system, and will be served on the following attorney in charge for Plaintiff, Raul Maldonado De Los Reyes, via electronic filing or regular mail:

Larry Lawrence  
Michael Lawrence  
Lawrence Law Firm  
Email: [Lawrencefirm@gmail.com](mailto:Lawrencefirm@gmail.com)  
Mr. Dan Cartwright  
Ms. Lory Sopchak  
Cartwright Law Firm, LLP  
Email: [Lory@dcartwrightlaw.net](mailto:Lory@dcartwrightlaw.net)

#### **VIA E-FILING**

/s/Mikell A. West

Mikell A. West